1	DAVID C. WEISS Special Counsel	
2	LEO J. WISE Principal Senior Assistant Special Counsel	
3	DEREK E. HINES	
4	Senior Assistant Special Counsel SEAN F. MULRYNE	
5	CHRISTOPHER M. RIGALI Assistant Special Counsels	
6	950 Pennsylvania Avenue NW, Room B-200	
7	Washington, D.C. 20530 Telephone: (771) 217-6091	
8	E-mail: christopher.rigali2@usdoj.gov Attorneys for the United States	
9	Attorneys for Plaintiff UNITED STATES OF AMERICA	
10	UNITED STATES DISTRICT COURT	
11	FOR THE CENTRAL DISTRICT OF CALIFORNIA	
12	UNITED STATES OF AMERICA,	No. 2:24-cr-00091-ODW
13	Plaintiff,	GOVERNMENT'S APPLICATION FOR
14	v.	PERMISSION TO FILE AN OVERSIZED BRIEF
15	·	
16	ALEXANDER SMIRNOV, PROPOSED ORDER FILED SEPARATELY	
17	Defendant.	
18		
19	Plaintiff, United States of America, by and through its counsel	
20	of record, the Office of Special Counsel David C. Weiss, hereby applies	
21	to this Honorable Court for permission to file an oversized brief.	
22	Pursuant to Local Rule 11-6.1 and this Court's required	
23	procedures, "[m]emoranda of points and authorities in support of or in	
24	opposition to motions shall not exceed 7,000 words." The Court requires	
25	a showing of "good cause" to "grant an application to extend these page	
26	limits."	

The Government respectfully seeks leave of Court to file an

oversized brief-it's Memorandum of Law in Support of the Government's

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Case 2:24-cr-00091-ODW Document 87 Filed 06/24/24 Page 2 of 2 Page ID #:1215

Motion for a Protective Order Pursuant to Section 4 of the Classified Information Procedures Act and Federal Rule of Criminal Procedure 16(d)(1). See ECF No. 86 (Notice of Manual Filing). Given the quantity and complexity of the issues raised in the Government's Motion for a Protective Order, the Government submits that more than 7,000 words are required to adequately bring to the Court's attention matters pertaining to the discoverability of classified information. As such, the Government respectfully requests that the Court grant this application, for good cause shown, and permit the Court to file an oversized brief.

Dated: June 24, 2024

Respectfully submitted,

DAVID C. WEISS Special Counsel

LEO J. WISE Principal Senior Assistant Special Counsel

DEREK E. HINES Senior Assistant Special Counsel

SEAN F. MULRYNE Assistant Special Counsel

Chr M. Nigel.

CHRISTOPHER M. RIGALI Assistant Special Counsel

Attorneys for Plaintiff UNITED STATES OF AMERICA